

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**TRUSTEE'S OBJECTION TO CONFIRMATION OF 2ND AMENDED PLAN**

**COMES NOW** John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. The plan does not provide sufficient funds to pay all creditors entitled to full payment, including fair market value of secured claims and priority debts. 11 USC Secs. 1322(a)(2) & 1325(a)(5)(B)(ii)
2. The plan contains insufficient funds to make the guaranteed repayment to general unsecured creditors.
3. The plan is ambiguous or incapable of ascertainment (11 U.S.C. Secs. 1321 & 1325(a)(3)) because:  
The plan fails to provide any special treatment of the scheduled secured debt to Northland Credit, but does not contain enough funds to pay this \$95,000 debt, for which a proof of claim has already been filed.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

/s/ John V. LaBarge, Jr.

DSD-351

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